REMARKS

Applicants respectfully request reexamination and reconsideration of the above-referenced application. Claims 1-30 are pending in this application. Claims 1-30 are rejected by the examiner. Claims 1, 14, 29 and 30 are independent claims.

The examiner uses Khan and Alleva to reject claims 1, 7-12 and 25-30 as having been obvious.

Independent claims 1, 14, 29 and 30 recite "outputting a prose rendition of the query," or similar language. The examiner admits that Khan does **not** explicitly teach outputting a prose rendition of the query. The examiner argues that Alleva teaches outputting a prose rendition of the query in the abstract and at col. 10, lines 13-26 and col. 11, lines 1-3.

Applicants disagree and respectfully suggest that the examiner's reliance on Alleva is misplaced. Alleva fails to teach, suggest or even mention a query or outputting a prose rendition of the query. Alleva teaches a text normalizer. A text normalizer normalizes text that is output from a speech recognizer. The normalization of the text produces text that is less awkward and more familiar to recipients of the text. More specifically, Alleva discloses:

> The present invention overcomes the limitation of prior art speech recognizers by providing a facility for normalizing text. The normalization of text produces output text that is more acceptable to recipients. (col. 1, lines 35-37)
>
> (T)he present invention provides a mechanism for normalizing text that is received from a speech recognizer. A context-free grammar is applied to perform the text normalization. The context-free grammar includes a number of rules that specify how the text is to be normalized. These rules are applied to textual output received from the speech recognizer to produce normalized text. In the preferred embodiment of the present invention, the text normalization is performed within an application program interface (API) that may be called by application programs to receive text corresponding to speech input. (col. 2, lines 57-67)

This is different from outputting a prose rendition of the query. One skilled in this art recognizes that a query is a request for information from a database (see Randon House Webster's "Computer & Internet Dictionary, Third Edition, a copy of which is attached for the convenience of the examiner). Alleva fails to teach or even suggest any request for information

from a database. Assuming arguendo that Alleva did teach processing a query, and it does not, Alleva still fails to suggest outputting a prose rendition of the query. That's at least because applicants' claimed invention takes words entered as a query to a database and outputs an ordinary language rendition of that query. On the contrary, Alleva merely discloses a text normalizer for normalizing input text. For example, Alleva would take an input text of "one hundred forty-seven" and output a normalized text of "147." The text normalization of Alleva clearly does not teach or suggest outputting a prose rendition of the query as claimed in independent claims 1, 14, 29 and 30. Accordingly, claims 1, 14, 29 and 30 are not rendered obvious by Khan and Alleva.

All of the dependent claims are patentable for at least the same reasons as the claims on which they depend.

The applicants' discussion of particular arguments of the examiner should not be construed as a concession by the applicants with respect to any other positions of the examiner. The applicants' assertion of arguments for patentability of certain claims should not be construed as suggesting that there are not also other good reasons why those or other claims are patentable.

Applicants ask that all claims be allowed. Please apply any charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: January 8, 2004

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11646-013001

RANDOM HOUSE WEBSTER'S COMPUTER & INTERNET DICTIONARY

Third Edition

Philip E. Margolis

Random House
New York

11646-013001

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Library of Congress Cataloging-in-Publication Data
Margolis, Philip E.

Random House Webster's computer & internet dictionary / Philip E. Margolis. -- 3rd ed.
p. cm.
Rev. ed. of: Random House personal computer dictionary. 2nd ed. c1996.
Includes biographical references and index.
ISBN 0-375-70351-9
1. Microcomputers--Dictionaries. 2. Computers--Dictionaries.
I. Margolis, Philip E. Random House personal computer dictionary.
II. Title.
QA76.15.M37 1998
004.16'03--dc21 98-45280
CIP

www.randomwords.com

Typeset and printed in the United States of America.

1999 Third Random House Edition

0 9 8 7 6 5 4 3
January 2000

ISBN: 0-375-70351-9

New York Toronto London Sydney Auckland

11646-013001

QIC Abbreviation for *q(uarter)-i(nch) c(artridge)*, pronounced *quick*, a standard for magnetic tape drives. QIC tapes are among the most popular tapes used for backing up personal computers. QIC tapes are divided into two general classes: full-size (also called *data-cartridge*) and mini-cartridge.

The QIC-40 and QIC-80 standards are sometimes referred to as *floppy tape* standards because they are designed to use a personal computer's existing floppy disk drive controller instead of requiring a customized controller.

The newest set of QIC standards is based on the Travan technology developed by 3M.

The various QIC standards are controlled by a consortium of manufacturers called the *Quarter-Inch Cartridge Drive Standards, Inc.* The term *QIC*, therefore, is used to refer both to the type of tape and to the standards-producing organization.

⇒ See also MASS STORAGE; TAPE; TRAVAN.

QoS Short for *Quality of Service*, a networking term that specifies a guaranteed throughput level. One of the biggest advantages of ATM over competing technologies such as Frame Relay and Fast Ethernet is that it supports QoS levels. This allows ATM providers to guarantee to their customers that end-to-end latency will not exceed a specified level.

⇒ See also ATM; CIR; LATENCY; RSVP.

QTVR See QUICKTIME VR.

quad-speed CD-ROM drive A CD-ROM drive designed to run four times as fast as original models. Often denoted as *4X CD players*, they provide data transfer rates of 600K per second and data access times as low as 125 milliseconds (ms).

⇒ See also CD-ROM PLAYER.

Quality of Service See QoS.

quarter-inch cartridge See QIC.

query *n* **1.** A request for information from a database. There are three general methods for posing queries:

choosing parameters from a menu: In this method, the database system presents a list of parameters from which you can choose. This is perhaps the easiest way to pose a query because the menus guide you, but it is also the least flexible.

query by example (QBE): In this method, the system presents a blank record and lets you specify the fields and values that define the query.